

[Submitting counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

E.F., an individual; and G.H., an individual,

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER
COMPANIES, INC.; and DOES 1-50,
inclusive,

Defendants.

Case No. 4:24-CV-00643-JST

**JOINT STIPULATION AND
[PROPOSED] ORDER RE: MOTION
TO DISMISS BRIEFING IN
RELATED CASES**

Assigned to: Judge Jon S. Tigar
Complaint Filed: February 6, 2024

Q.R., an individual; and S.T., an individual,

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER
COMPANIES, INC.; and DOES 1-50,
inclusive,

Defendants.

Case No. 24-cv-00689

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I.J., an individual; K.L., an individual,

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER
COMPANIES, INC.; and DOES 1-50,
inclusive,

Defendants.

Case No. 24-cv-00693

M.N., an individual; O.P., an individual,

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER
COMPANIES, INC.; and DOES 1-50,
inclusive,

Defendants.

Case No. 24-cv-00696

KEARSTEN WALDEN AND ZACHARY
WALDEN,

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER
COMPANIES, INC.; and DOES 1-50,
inclusive,

Defendants.

Case No. 3:24-cv-00903

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A.B., an individual; C.D., an individual

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER
COMPANIES, INC.; and DOES 1-50,
inclusive,

Defendants.

Case No. 4:24-cv-01061

J.B., an individual; M.B., an individual

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER
COMPANIES, INC.; and DOES 1-50,
inclusive,

Defendants.

Case No. 3:24-cv-01085

CLF 001, an individual; CLF 002, an
individual,

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER
COMPANIES, INC.; and DOES 1-50,
inclusive,

Defendants.

Case No. 24-cv-01192

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CLF 003, an individual; CLF 004, an individual

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER COMPANIES, INC.; and DOES 1-50, inclusive,

Defendants.

Case No. 24-cv-01193

CLF 005, an individual; CLF 006, an individual,

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER COMPANIES, INC.; and DOES 1-50, inclusive,

Defendants.

Case No. 24-cv-01194

F.G., an individual; H.I., an individual, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

COOPERSURGICAL, INC.; THE COOPER COMPANIES, INC.; and DOES 1-50, inclusive,

Defendants.

Case No. 4:24-cv-01261

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J.S., an individual; A.S., an individual, Plaintiffs, v. COOPERSURGICAL, INC.; THE COOPER COMPANIES, INC.; and DOES 1-50, inclusive, Defendants.
J.K., an individual; L.M., an individual, Plaintiffs, v. COOPERSURGICAL, INC.; THE COOPER COMPANIES, INC.; and DOES 1-50, inclusive, Defendants.
JAMIE WOODS AND LEE WOODS, Plaintiffs, v. COOPERSURGICAL, INC.; THE COOPER COMPANIES, INC.; and DOES 1-50, inclusive, Defendants.
R.S., an individual, Plaintiff, v. COOPERSURGICAL, INC.; THE COOPER COMPANIES, INC.; and DOES 1-10, inclusive, Defendants.

Case No. 3:24-cv-01353

Case No. 3:24-cv-01680

Case No. 4:24-cv-1745

Case No. 4:24-cv-02031

1 N.O., an individual, and P.Q., an individual,

2 Plaintiffs,

3 v.

4 COOPERSURGICAL, INC.; THE COOPER
5 COMPANIES, INC.; and DOES 1-10, inclusive,

6 Defendants.

Case No. 4:24-cv-02042

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8 BROOKE OXENDINE, an individual, and
9 MICHAEL OXENDINE, an individual,

10 Plaintiffs,

11 v.

12 COOPERSURGICAL, INC.; THE COOPER
13 COMPANIES, INC.; and DOES 1-10, inclusive,

14 Defendants.

Case No. 3:24-cv-02168

15 A.A., an individual,

16 Plaintiff,

17 v.

18 THE COOPER COMPANIES, INC.;
19 COOPERSURGICAL, INC.; and DOES 1-10,
20 inclusive,

21 Defendants.

Case No. 4:24-cv-02582-JST

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23 Plaintiffs in the above-captioned related cases (“Plaintiffs”) and Defendants CooperSurgical
24 Inc. and The Cooper Companies, Inc. (“Defendants”) (collectively, the “Parties”), by and through
25 their undersigned counsel of record and subject to the Court’s approval, submit this Stipulation and
26 Proposed Order. Pursuant to the Court’s guidance that an efficient use of judicial and party resources
27 would be to brief threshold issues of personal jurisdiction and venue prior to other issues, the Parties
28 stipulate as follows:

1 WHEREAS, Defendants have filed motions to dismiss in six of the related cases;

2 WHEREAS, issues related to personal jurisdiction and venue are threshold issues common
3 to all the related cases;

4 WHEREAS, at the Case Management Conference on May 6, 2024, the Court directed the
5 parties to address issues of personal jurisdiction and venue first by selecting one of the six cases
6 where a motion to dismiss is pending and filing a limited opposition and limited reply addressing
7 only those issues;

8 WHEREAS, subject to Court approval, the Parties agree that:

9 1. Plaintiffs will respond, as follows, to arguments raised in the motions to dismiss filed
10 in the matter styled *Kearsten Walden and Zachary Walden v. CooperSurgical, Inc. et*
11 *al.*, Case No. 4:24-cv-00903-JST:

12 a. On the motion to dismiss on behalf of The Cooper Companies, Inc., (4:24-cv-
13 00903-JST, Dkt. 16):

14 i. Failure to state a claim against The Cooper Companies, Inc. as a direct
15 actor, including improper group pleading, to the extent they implicate
16 personal jurisdiction and venue; and

17 ii. Failure to state a claim against The Cooper Companies, Inc., as a parent
18 corporation of CooperSurgical, Inc., to the extent they implicate personal
19 jurisdiction and venue.

20 b. On the motion to dismiss on behalf of CooperSurgical, Inc. (4:24-cv-00903-JST,
21 Dkt. 17)

22 i. Personal jurisdiction;

23 ii. Venue; and

24 iii. Rule 8 pleading issues to the extent they implicate personal jurisdiction
25 and venue.

26 2. The briefing schedule for the limited opposition and limited reply will be as follows:

27 a. Plaintiffs' opposition due May 28, 2024;

28 b. Defendants' reply due June 4, 2024; and

c. Hearing July 3, 2024 at 2 p.m.

d. The June 26, 2024 Case Management Conference is moved to July 17, 2024
at 1:30 p.m.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: May 8, 2024

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/s/ Adam B. Wolf

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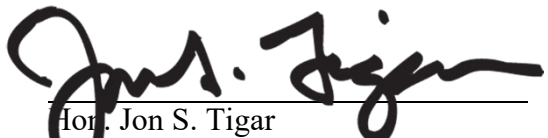
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*Counsel for Defendants, CooperSurgical,
Inc. and The Cooper Companies, Inc.*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 10, 2024



Hon. Jon S. Tigar
United States District Court Judge

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ATTESTATION OF FILER

Pursuant to Civil L.R. 5-1(i)(3), the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: May 8, 2024

/s/ Dena C. Sharp
Dena C. Sharp

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Dated: May 8, 2024

Dena C. Sharp